

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

| | | |
|------------------------------|---|-------------------------|
| JOSEPH HOWARD |) | |
| FRANK HOWARD |) | |
| DOROTHY HOWARD |) | |
| Plaintiffs |) | Case Number: 12-CV-3737 |
| |) | |
| vs. |) | |
| |) | CIVIL COMPLAINT |
| NORTHSTAR LOCATION SERVICES, |) | |
| LLC |) | |
| Defendant |) | |
| |) | |

**TO THE CLERK OF THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY:**

Plaintiffs, Joseph Howard, Frank Howard and Dorothy Howard by and through her attorney, Bruce K. Warren, Esquire, requests that the Clerk of this Court enter the default of Defendant, for failure to plead or otherwise defend in a timely manner, as provided by Rule 55 (a) of the Federal Rules of Civil Procedure.

This request is based on the attached Affidavit of Bruce K Warren, Esq. Attorney for Plaintiff, which shows:

1. Defendant, Northstar Location Services, LLC was served with the Civil Action Complaint and Summons in a Civil Action on August 7, 2012 at 12:17pm.
2. The Certificates of Service filed with this Court on August 23, 2012, which establishes that service was proper pursuant to Rule 4 of the Federal Rules of Civil Procedure. A copy of the Certificates of Service and Notice of Electronic Filing of same, is attached to the Affidavit of Bruce K Warren, Esq., Esquire, collectively as Exhibit "A"

3. Defendant has failed to plead or otherwise respond to the Civil Action Complaint.

4. The applicable time limit for responding has expired.

5. Defendant is NOT infant or an incompetent person.

Dated: September 21, 2012

Warren Law Group, P.C.

BY: /s/ Bruce K. Warren
Bruce K Warren, Esq., Esquire
Attorneys for Plaintiff
58 Euclid Street
Woodbury, NJ 08096
856-848-4572
Bruce@warren-lawfirm.com

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**AFFIDAVIT IN SUPPORT OF REQUEST TO
ENTER THE DEFAULT OF VANDERBILT & ASSOCIATES, LLC
(Fed. R. Civ. P. 55(a))**

AFFIDAVIT OF BRUCE K. WARREN

State of New Jersey)
County of Gloucester)
)

Bruce K Warren, Esq., being duly sworn, deposes and states:

1. My name is Bruce K Warren, Esq.
2. I am over 18 years of age. I am a partner in the law firm of Warren Law Group, P.C. and represent the plaintiffs. in this matter. I am fully competent to make this affidavit and I have personal knowledge of the facts stated in this affidavit.
3. I am the attorney for the plaintiff in this action.
4. Defendant, was served with the Civil Action Complaint and Summons in a Civil Action on August 7, 2012 see Proof of Service and Notice of Electronic Filing at Docket Entry #3.
5. Defendant has failed to serve and file a Response/Answer to the filed Civil Action Complaint.

6. Under Rule 12(a) of the Federal Rules of Civil Procedure, the time limit for responding to the Civil Action Complaint has now expired, and the time for response has not been extended by any stipulation of the parties or any order of the Court.

7. Defendant could not be an infant or incompetent person within the meaning of Rule 55(a) of the Federal Rules of Civil Procedure because they are corporations,

Signed by me on September 21, 2012

/s/Bruce K. Warren

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| LLC |) | |
| Defendant |) | |
| _____ |) | |

DEFAULT

AND NOW on this ____ day of _____, 2012, **DEFAULT** is hereby entered against both defendants, for failure to plead or otherwise defend pursuant to Rule 55(a), Federal Rules of Civil Procedure.

Dated: _____

Clerk

Deputy-In-Charge